

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

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EDUARDO LI,	:	
	:	1:15-CV-06099 (RJD-JO)
Plaintiff,	:	
	:	
-against-	:	
	:	
CERTAIN UNDERWRITERS AT LLOYD’S,	:	
LONDON, AXIS SPECIALTY EUROPE SE;	:	
	:	
Defendants.	:	

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**JOINT PROPOSED DISCOVERY PLAN**

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the Local Rules, and this Court’s October 29, 2015 Case Management and Scheduling Order, counsel of record for Plaintiff Eduardo Li and Defendants Certain Underwriters at Lloyd’s, London, and Axis Specialty Europe SE, hereby submit the following Joint Proposed Discovery Plan:

1. Deadline for all Rule 26(a)(1) disclosures: December 2, 2015.
2. Deadline for first request for production of documents and first request for interrogatories: January 29, 2016.
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules: Plaintiff: 0; Defendants: 0.
3. Date for completion of any joinder of additional parties and amendment of the pleadings: April 29, 2016.
- 3(a). Number of proposed additional parties to be joined, if any:  
Plaintiff: None at this time; Defendants: None at this time.
4. Number of depositions by Plaintiff of parties and non-parties: maximum of 10.

5. Number of depositions by Defendants of parties and non-parties: maximum of 10.
6. Date of status conference (joint status report due two business days in advance):  
May 12, 2016.
7. Date for completion of factual discovery: May 26, 2016.
8. Are expert witnesses needed: Yes. Defendants anticipate requiring an Underwriting Expert and Expert in Swiss law and reserve their rights to call experts on all other topics. Plaintiff reserves his rights to call experts on these and all other topics.
9. Date for completion of expert discovery: June 20, 2016.
10. Date of pretrial conference: July 15, 2016.
11. Types of contemplated dispositive motions by Plaintiff and date for filing motion:  
Motion for partial summary judgment on defense cost payments.  
Summary judgment must be filed by July 1, 2016.
12. Types of contemplated dispositive motions by Defendants and date for filing motion: Summary judgment must be filed by July 1, 2016.
13. Have counsel reached any agreements regarding electronic discovery: The parties are currently discussing the scope of electronic discovery and request that the court permit the parties to submit a Stipulation and Proposed Order Establishing a Protocol for the Production of Electronically Stored Information on or before January 29, 2016.
14. Have counsel reached any agreements for disclosure of experts' work papers and communications with experts: To be determined.

15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. § 636(c): No.

Dated: New York, New York  
November 30, 2015

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